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September 13, 2022

BY ECF

Hon. Stewart D. Aaron
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 1970
New York, NY 10007

**Re: *United States of America and States of the United States, ex rel.
Donohue v. Richard Carranza, et al.*, 1:20-CV-5396 (GHW)**

Dear Judge Aaron:

This firm, together with the New York City Law Department, represents defendants New York City Department of Education and former Chancellors Carranza and Porter (“NYC DOE”); this firm also represents defendants Board of Education of the City of Chicago (identified as the Chicago Public School District in Relator’s Second Amended Complaint (“SAC”)) and former Superintendent Torres (the “Chicago BOE”), and Los Angeles Unified School District and former Superintendent Beutner (“LAUSD,” together with NYC DOE and Chicago BOE, the “School Districts”) in the above-referenced case.

Pursuant to your Honor’s Individual Rules, and with Plaintiff-Relator’s consent, we submit this letter to request a three page enlargement of the School Districts’ reply memorandum in further support of their motion to dismiss the SAC, which is currently due September 16, 2022.

The School Districts filed a joint motion to dismiss the SAC on June 30, 2022. (ECF Nos. 165, 168-169.) Plaintiff-Relator submitted two separate memoranda in opposition to the School District’s motion to dismiss: one pertaining to the NYC DOE; and one pertaining to all other defendants, including the Chicago BOE.¹ (*See* ECF Nos. 178, 179, respectively.) The purpose of this enlargement request—which, if granted, would increase the School Districts’ reply memorandum page limit from ten pages to thirteen pages—is to allow additional space to address Plaintiff-Relator’s opposition arguments as to the School Districts in a single reply memorandum.

¹ Plaintiff-Relator has agreed to voluntarily dismiss the claims alleged against LAUSD. (*See* ECF No. 180.)

This is the School Districts' second enlargement request; the first unopposed request, as to the School Districts' moving memorandum, was granted at the Court's hearing held May 24, 2022. (*See* Hr'g Tr. 35:5-36:3, ECF No. 154.)

Respectfully,

/s/ Joseph V. Willey

Joseph V. Willey

Cc: All counsel of record, via ECF